



November 10, 2007

Mr. Ross del Rosario
U. S. EPA - Region 5 (SR-6J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

**Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
Monthly Report October 1 – October 31, 2007**

Dear Mr. del Rosario:

Enclosed is the Sauget Sites Area I Monthly Report for the October 2007 reporting period. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven D. Smith".

Steven D. Smith
Project Coordinator

cc: Kevin Turner – USEPA
Tim Gouger - USACE
Sandra Bron - IEPA
Dave Webb - IDPH
Mike Coffey - USF&W
Richard Williams - Solutia
Cathleen Bumb - Solutia
Mayor Frank Bergman - Cahokia, IL
Village of Sauget - c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor R. Sauget - Sauget, IL
L. Glen Kurowski - Monsanto
Linda Tape - Husch & Eppenberger

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Status Report

Date of Report: November 10, 2007
Period Covered: October 1, 2007 - October 31, 2007

Work Performed during the Reporting Period

Samples in the utility corridors along Queeny Avenue between Sites H and I were obtained on June 7th in accordance with the requirements of the Work Plan approved on March 22nd. Analytical results for these samples have been received and the data have been validated. The risk assessment described in Section 4 of the Work Plan will be carried out once that portion of the Work Plan is approved. Responses to Agency comments on this section were submitted on May 24th and additional Agency comments were received on August 28th. A teleconference was held on September 13th to discuss these latest comments and proposed responses. Acceptable responses were agreed upon during the call and a revised version of Section 4 of the Work Plan was submitted on October 5th. The results of the investigation, together with the risk assessment, will be submitted in November.

A report presenting the results of the investigation to determine if cadmium leached from the creek bottom soils into the groundwater was submitted to the Agency on October 25th. The investigation established that the concentration of cadmium in the groundwater downstream of Dead Creek was well below the Illinois Class I groundwater standard, with the majority of the samples concentrations being less than 5 percent of that standard.

The final Work Plan for the Soil Vapor Intrusion Investigation was approved on May 24th and Agency comments on the investigation data report were also received on that same day. Responses to those comments are being prepared. USEPA issued comments on a Technical Memorandum summarizing the results of a human health evaluation submitted to the Agency on March 19th. These comments are dated June 8th. However, they were not received at that time by the Project Coordinator and the comments were reissued on September 20th. A teleconference was held with the Agency and its oversight contractor, CH2M Hill, on October 23rd. The human health evaluation is being revised to respond to the comments and the discussion during the teleconference.

USEPA is also reviewing a Technical Memorandum documenting the derivation of risk-based concentrations used in the Dead Creek removal work and in the Dead Creek Ecological Risk Assessment submitted to the Agencies on July 27th.

The following items that were discussed during a May 24th teleconference with USEPA and CH2M Hill remain outstanding:

- The status of the Technical Memorandum presenting the results of the Human Health Risk Assessment for a residential child exposure in Dead Creek. This Tech Memo was submitted to the Agencies in April 2006.
- The status of the approval of the Tech Memo on Principal Threat Evaluation for Toxicity. This memo was initially submitted in January 2006. The Agency agrees that no Principal Threat materials were found in the Area 1 disposal sites.
- Agency comments on the proposed changes to the draft RI report.

Attachments

There are no Technical Memoranda or data submitted with this report.

Work Scheduled for Next Reporting Period

- Submit responses to the Agency comments on the Soil Vapor Intrusion Investigation data report.
- Revise the Technical Memorandum summarizing the results of the human health evaluation carried out as part of the Soil Vapor Intrusion Investigation.
- Submit the results of the Utility Corridor Investigation. Including the human health risk assessment.